**Commonwealth Workplace Safety and Health Program**

**Requirement Guide**

**(Mandatory Program Elements - A through O)**

**Introduction:**

The Bureau of Workers’ Compensation (BWC) of the Department of Labor and Industry regulates the requirements of an adequate Accident and Illness Prevention Program (AIPP). To meet the regulations for workers’ compensation self-insurance status, the commonwealth must satisfy these requirements.

The AIPP (also referred to as A&IP Program) has lists of required program elements (Mandatory Elements A through O) and additional protocols if the agency has exposure to specific hazards (P elements). Each agency participating in the workers’ compensation program must develop a program specific to their needs that complies with the regulations and commonwealth safety standards.

**Using the Guide:**

The guide includes the definition of the Program Element as defined by the BWC as well as the requirements that must be addressed for compliance with the element. The written policy/procedure must include each identified factor. Minimum training and communications requirements are also provided and must be satisfied. The program must be reviewed for compliance and effectiveness on an annual basis with appropriate actions taken to address any program deficiencies. In some cases, as noted with the Element, more frequent monitoring or analysis may be required. Records of an adequate program must be maintained for the three most current and complete fiscal years. Additional recordkeeping requirements may apply and are specifically listed for those elements.

To assist in implementing these requirements, a template manual that includes written policies and procedures as well as template communications is available. It is recommended that program policies, procedures, and recordkeeping be maintained within the agency’s workplace safety and health manual. However, it is recognized that it may not be efficient or practical to maintain all of the necessary program documentation in the manual (separate files or worksite locations).

**A. Safety Policy Statement**

Definition: A written statement regarding the Accident & Illness Prevention Policy that contains the Self‑Insured Employer’s philosophy regarding accident and illness prevention. The Safety Program Policy statement serves as the foundation for all program activities. The statement should be signed by a Chief Executive Officer and is communicated to all employees.

Written Policy/Procedure:

1. Must reflect the agency’s philosophy and commitment to the safety program.
2. Should include action words and be consistent with the agency’s mission.
3. Must demonstrate a proactive safety philosophy focused on continuous improvement.
4. Must be signed by the current agency head.

Training and Communications:

1. Provide a copy at new employee orientation.
2. Distribute to all employees annually.

Program Review:

Annually review for needed changes or updates.

Recordkeeping:

1. Maintain documentation that the statement was provided during new employee orientation and annually communicated to all employees.
2. Maintain documentation that shows that statement is reviewed annually.

 **B. Designated A&IP Program Coordinator**

Definition: An individual(s) appointed by the employer to coordinate the provision of the Accident & Illness Prevention Program, by location or on a company wide basis. Assignment of the Safety Program Coordinator must be documented and made part of the designated individual’s duties and responsibilities.

Written Policy/Procedure:

1. List name and contact information of the agency safety coordinator (Note: A minimum of one individual must be designated as the agency safety coordinator.).
2. Include the assignment of the safety coordinator role and their main safety responsibilities within the employee’s position description.
3. List any central office, field, or facility staff that is responsible for the coordination of the safety program and where such duties are part of their official position description.

Training and Communications:

1. The agency safety coordinator must satisfactorily complete the mandatory safety coordinator orientation training.
2. Provide the central office and field safety coordinator names and contact information at new employee orientation and to all employees annually (via email, memo, intranet, written policy, etc.).

Program Review:

1. Update contact information as changes occur.
2. Annually review position description(s) for needed changes or updates.

Recordkeeping:

1. Maintain documentation when the coordinator information was last reviewed or updated.
2. Maintain documentation that contact information was provided during new employee orientation and annually communicated to all employees.
3. Maintain copy of position descriptions of all staff assigned safety coordinator responsibilities.

**C. Assignment of Responsibilities for Developing, Implementing, and Evaluating the A&IP Program**

Definition: Assignment of Accident & Illness Prevention Program responsibilities, as they pertain to employees and staff, (includes contracted providers retained and responsible for certain program elements). The individual, position and/or title of the position and the assignment of individual or position responsibilities must be documented.

Written Policy/Procedure:

1. List all of the program duties and responsibilities of the Safety Coordinator.
2. List the safety responsibilities for staff that assist with the development, implementation, and evaluation of the program.
3. Include names, positions/titles, and a listing of their assigned safety and health program responsibilities.
4. Additional staff members or groups may include, but are not limited to: safety support staff, safety committee members and chairpersons, inspection teams, managers/supervisors, housekeeping staff, and general employee responsibilities.
5. List the names, company, and contact information for all contractors responsible for certain program elements. Types of contractors may include, but are not limited to, Safety and Loss Control Consultants and Industrial Hygienists.

Training and Communications:

1. Provide information regarding safety-related responsibilities during new employee orientation.
2. Provide general safety-related responsibilities to all employees annually.

Program Review:

1. Update lists as staff changes.
2. Review entire list annually for changes in staff or responsibilities.
3. Review documentation and/or training records to ensure program responsibilities were effectively communicated.

Recordkeeping:

1. Maintain documentation when the program responsibility information was last reviewed or updated.
2. Maintain documentation that responsibilities are provided during new employee orientation and annually communicated to all employees.

**D. Program Goals and Objectives**

Definition: A documented procedure explaining how Accident & Illness Prevention Program goal(s) and objective(s) are set. Example: a goal may be a 25% reduction in the number of recordable injuries (OSHA definition) during a specific period; while an objective could be the improvement of safety procedures related to a task or operation.

Written Policy/Procedure:

1. List the methods for developing and administering the agency’s safety goals and objectives, including:
2. Assigned responsibilities for development.
3. Methods, information, and data used to establish the goals/objectives.
4. Established timeframes for development and evaluation.
5. Methods to track progress / achievement.
6. Reporting and communication requirements (internal and external).
7. List annual program goals and objectives to include the following:
8. Specific goal for injury/claims reduction and prevention.
9. Objectives or action items directly related to the reduction goal.
10. Goals and objectives to improve the overall quality and effectiveness of the program.
11. Objectives to maintain program compliance.
12. If applicable, require bureaus, districts, field offices, safety committees, etc., to establish their own goals and objectives and identify how they are communicated to the agency safety coordinator to ensure consistency with overall agency goals.
13. If applicable, identify how goals and objectives are incorporated into the safety committee meeting agenda, including development, review, and/or status updates.
14. When possible, use SMART Goals or a similar format to develop and define your goals and objectives. SMART is an acronym that most often represents Specific, Measurable, Achievable, Relevant, and Time-Based.

Training and Communications:

1. Communicate annual goals/objectives and periodic status reports within the agency and at least to upper management (agency head, deputy secretaries, and bureau directors).
2. At minimum, they must be provided to the Deputy Level or agency equivalent within the safety coordinator’s chain of command.
3. Provide data collection responses and progress reports to the Office of Administration upon request (generally in August and February).

Program Review:

1. Goals and objectives consistent with the agency’s needs must be established annually.
2. The status of goals and objectives must be periodically monitored and the completion/effectiveness evaluated at least annually.

Recordkeeping:

1. Maintain annual goals/objectives and related status reports.
2. Document the communication of annual goals and objectives and periodic status reports within the agency or at least to upper management.

**E. Methods for Identifying and Evaluating Hazards and Developing Corrective Actions for their Mitigation**

Definition: Written procedures for identifying hazards, evaluating hazards, and developing corrective actions for their mitigation. The purpose of written procedures is to eliminate or reduce occupational accidents, injuries, and illnesses. Activities may include, but not be limited to: providing solutions, explanations, resources, reference materials, and referrals.

Written Policy/Procedure:

1. Ensure workplace hazard assessments / inspections are conducted for all occupied work locations.
2. Identify who is responsible for conducting and reviewing assessments / inspections (safety coordinator, safety support staff, safety committee members, supervisors, or other agency designated staff).
3. List the frequency of assessments / inspections and ensure it is consistent with the hazard and risk potential. At minimum, inspections must be conducted semi-annually for all occupied work locations and at least quarterly for areas with higher risk or more significant hazards.
4. Identify methods used to conduct worksite hazard assessments / inspections (checklists, forms, written reports, formal assessments, surveys, etc.) for the various agency work environments (office setting, laboratory, hospital, garage, warehouse, maintenance shops, outdoor work settings, printing operation, etc.).
5. Identify the process or methods for developing and tracking corrective actions through to completion.

Training and Communications:

1. Conduct hazard identification training for staff assigned the responsibility of conducting safety inspections.
2. Provide management with the findings of safety assessments, inspections, and/or reports.

Program Review:

1. Review current methods annually to determine compliance and effectiveness with appropriate actions taken to address any program deficiencies.

Recordkeeping:

1. Maintain completed assessments and inspections for current year and the two previous years.
2. Maintain records showing that corrective actions are tracked and implemented, such as work order forms, communications, work logs, inspection forms, etc.
3. Maintain copies of communications to management regarding hazard identification, awareness, and corrective actions.

**F. Industrial Hygiene Surveys**

Definition: Surveys required by the nature of the individual self-insured employer’s workplace and worksite environments. These surveys may include suspected chemical, physical or biological exposures, and produce recommendations designed to control and/or prevent identified exposures.

Written Policy/Procedure:

1. Develop methods used to identify, report, and respond to industrial hygiene concerns.
2. Identify roles and responsibilities for evaluating concerns, providing recommendations, and initiating consultant services (ensure the Safety Coordinator is informed of the need for consultant services prior to any requests for services).
3. Identify the industrial hygiene evaluation report form used to evaluate issues (indoor air quality, mold, chemical exposures, lead, asbestos, etc.) and employee concerns.
4. Conduct monitoring as necessary to identify potential chemical, physical, biological, or radiological hazards and exposures.
5. Maintain a list of available and qualified consultants to address industrial hygiene survey needs.

Training and Communications:

1. Inform supervisors and employees of the proper procedures for reporting industrial hygiene related concerns during new employee orientation and at least every two years.
2. Provide awareness and recognition training as needed to address industrial hygiene related issues and avoid potential exposures (maintenance staff, custodial crews, affected employees, etc.).
3. Notify management, unions, and affected employees regarding the industrial hygiene related findings, recommendations, and corrective actions.

Program Review:

1. Annually review the established methods, communications, and services performed to determine compliance and effectiveness.

Recordkeeping:

1. Maintain documentation that the procedure was communicated to supervisors and employees.
2. Maintain completed industrial hygiene evaluation report forms.
3. Maintain documentation of completed industrial hygiene investigations, monitoring results, recommendations, and corrective actions. Note: Employee medical and exposure records must be maintained for the duration of employment plus 30 years.

**G. Industrial Health Services**

Definition: Written policy providing for industrial health services required by the nature of the individual self-insured employer’s workplace environment. These services should address the physical, mental, and social well being of employees in relation to their workplace environment. The results of these services may produce recommendations designed to identify, control, and/or eliminate health hazards.

Written Policy/Procedure:

1. Identify the services or programs provided to address the physical, mental, and social well being of employees in relation to their workplace environment.
2. Reference all agency policies, programs, or procedures in place to prevent and/or educate employees on the health hazards or exposures in the workplace (examples: medical monitoring programs, vaccination programs, health and wellness initiatives / screenings / fairs, workers’ compensation procedures, substance abuse education / testing / treatment, employee assistance program services, infectious diseases, sexual harassment, workplace violence, stress management, and other available health related information/brochures).
3. Identify agency and contracted service providers utilized or available to provide health related services.
4. List or reference the providers (Panel of Physicians) used to treat workplace incidents or the locations where the Panels of Physicians are posted throughout the agency.
5. Ensure the Safety Coordinator is kept informed of Occupational Health concerns, services, and related program areas in order to develop recommendations and minimize safety and health hazards.

Training and Communications:

1. Periodically inform employees regarding the types of available services and when they are offered.
2. Periodically provide employees with health related information and communications.

Program Review:

1. Annually review to determine the programs/services provided and if they are adequate to address the physical, mental, and social well being of employees in relation to their workplace environment.

Recordkeeping:

1. Maintain documentation that employees were notified of available health services and other health related information.
2. Maintain or gain access to records of services, events, and employee participation in health related programs.

**H. A&IP Orientation and Training**

Definition: A&IP orientation and training for the purpose of enhancing employees’ knowledge, skills, attitudes, and motivations concerning health and safety requirements relating to operations, processes and specific work environments.

Written Policy/Procedure:

1. Determine and list the various types of safety and health related training provided to new and existing employees.
2. List the frequency of safety training to occur on a periodic and continual basis.
3. Identify how supervisors inform new employees of job and worksite specific safety procedures and expectations (safety talks, hands-on instruction, formal certification training, pre-work meetings or inspections, etc.).
4. Identify and differentiate between mandatory and voluntary safety training.

Training and Communications:

1. Provide safety orientation training to all new employees.
2. Develop and provide periodic safety related training for all employees (examples may include: office safety, emergency evacuation / preparedness, Right-to-Know, hazard identification, back injury prevention, office workstation / general ergonomics, general safety rules and enforcement procedures, incident reporting and investigation procedures, indoor air quality, mold awareness, substance abuse awareness, etc.).
3. Develop and provide specific safety training required for selected groups of employees due to their responsibilities or the hazards associated with the nature of the work / worksite (examples may include: safety committee, first aid / CPR / AED, personal protective equipment, lockout / tagout, confined space entry, fire prevention, fall prevention, universal precautions, bloodborne pathogen cleanup / disposal, safe driving, powered industrial trucks, equipment / machinery operation, asbestos, lead, etc.).

Program Review:

1. On an annual basis review training provided and based on hazard assessments / inspections, determine if additional training is needed and/or required.
2. Evaluate content of training programs and feedback received to determine effectiveness. Make changes or improvements as necessary.

Recordkeeping:

1. Maintain attendance records for all safety related training.
2. Maintain the curriculum of safety and health training provided.

**I. Regularly Reviewed and Updated Emergency Action Plan**

Definition: A written plan designed to provide a quick and pre-planned response to emergency events that include, but are not limited to: fires, floods, and gas leaks. The plan must include procedures for employee safety and accountability during emergency conditions.

Written Policy/Procedure:

1. Identify the specific written Emergency Action Plan for each occupied location (central, regional, field) that meets the following Management Directive standards:
* 720.7 - Bomb Threats and Suspicious Packages
* 205.38 Amended - Emergency Evacuation and Safe Assembly
1. Identify responsibilities, chain-of-command, decision-making procedures, and methods of communication during emergencies and/or evacuations.
2. Identify the names and contact information for individuals with emergency evacuation responsibilities (example: building fire marshal and alternate, floor chiefs, exit guards, searchers, buddies, or any other person(s) as appropriate to assist in the evacuation of employees and other persons from a building).
3. Identify the procedure for individuals that require assistance during an evacuation.
4. Identify the procedures for assembly and accountability following an evacuation.
5. Conduct evacuation drills at least annually or more frequently based on the International Fire Code and occupancy classification.
6. Post evacuation maps throughout the facility.

Training and Communications:

1. Provide new employees with information on emergency response and evacuation procedures during employee orientation.
2. Provide emergency response education / training to all employees at least annually.
3. Provide annual training to emergency evacuation / building safety team members.
4. Communicate or make accessible the emergency action plans, evacuation procedures, contact information, and any updates to all employees.

Program Review:

1. Review plans annually and update as needed.
2. Evaluate evacuation drills to determine effectiveness.
3. Upon request, ensure Emergency Action Plans are reviewed and approved by the appropriate authority having jurisdiction (AHJ).

Recordkeeping:

1. Maintain copies of the evacuation maps.
2. Maintain documentation of all drills, evaluations, and time to evacuate all occupants.
3. Maintain training records for emergency evacuation team, new employee orientation, and all employees.
4. Document the date the plan was last reviewed for update and compliance; include approval if requested by the AHJ.
5. Maintain communications to all employees.

**J. Employee A&IP Suggestion and Communication Programs**

Definition: A documented procedure describing the process whereby employees can offer suggestions and communicate their concerns related to employee A&IP.

Written Policy/Procedure:

1. Identify the process by which all employees, including regional or field offices, can communicate their safety concerns, recommendations and/or suggestions (examples: e-mail, internet, suggestion boxes, verbally).
2. Identify the Employee Suggestion Form used, which should include a place for the concern / suggestion, benefit of the suggestion, location involved, corrective methods, and contact information of the person submitting the suggestion.
3. Identify individual(s) responsible for reviewing and responding to employee suggestions.
4. Identify the frequency in which submissions are reviewed and the procedures for responding.
5. Identify the method(s) used for tracking responses to suggestions / concerns.
6. If suggestion boxes are used, identify their locations.

Training and Communications:

1. Inform all employees of the Suggestion and Communication Program procedures during new employee orientation and on an annual basis.

Program Review:

1. Annually evaluate the effectiveness of the program by reviewing the number of submissions, hazards identified, and the timeliness of responses.

Recordkeeping:

1. Maintain documentation that information was provided during new employee orientation and annually communicated to all employees.
2. Maintain responses to suggestions / concerns.

**K. A&IP Program Employee Involvement**

Definition: Documentation of method(s) whereby employees have the opportunity to participate in Accident & Illness Prevention Program projects and activities, including assumption of certain Program responsibilities, either on an assigned or voluntary basis.

Written Policy/Procedure:

1. Identify the safety committee(s) and their members.
2. Each agency must have at least one functioning Safety Committee.
3. The overall number of committees must be appropriate to involve an adequate number of staff in the safety process.
4. Consider factors such as total number of staff, regional and field locations, number of employee unions, and the type of work environments when determining an appropriate number.
5. Establish committee goals, agendas, and meeting minutes.
6. Explain the make-up of the committee, and strive for equal representation of both management (employer) and union (employee) staff. Ensure that all employee unions are represented.
7. Equal (50/50) representation becomes a mandatory requirement for safety committees seeking recognition from the Department of Labor and Industry, Bureau of Workers’ Compensation.
8. Work with the labor relations staff within the human resource office to reach out to the unions for safety committee representatives.
9. Identify the frequency of meetings, which should be held on a regular basis and at least quarterly.
10. Monthly meetings are required for all safety committees seeking recognition from the Department of Labor and Industry, Bureau of Workers’ Compensation.
11. Identify any additional opportunities where employees may become involved in the agency’s safety efforts through the assignment of program responsibilities, participation in available industrial health related services, and the safety suggestion program.

Training and Communications:

1. Provide initial and periodic training on the three established safety committee training modules (Safety Committee Operations, Hazard Identification, and Incident Investigation) to all committee members.
2. Communicate committee goals / objectives, agendas, and meeting minutes within the agency. At minimum, provide them to upper management and safety committee members. Include supervisors and employees as necessary to involve enough staff in the agency’s safety efforts.
3. Regional / site safety committees must goals/ objectives, agendas, and meeting minutes to the agency safety coordinator.

Program Review:

1. Annually review the following to determine program compliance and effectiveness.
2. Review initial and refresher training needs of the committees.
3. Review committee composition and the frequency / completion of meetings.
4. Review committee activities for agendas, meeting minutes, and accomplishing goals / objectives.

Recordkeeping:

1. Maintain agendas, meeting minutes, goals/objectives, and accomplishments for all committees or sub-committees.
2. Maintain training records for committee members.
3. Maintain documentation of employee involvement in other safety programs or activities.
4. Maintain documentation of communications.

**L. Established Safety Rules and Methods for their Enforcement**

Definition: Written safety rules and enforcement procedures that provide for a safe workplace environment and employee job performance.

Written Policy/Procedure:

1. Identify and develop the general safety rules / procedures to be followed by all employees.
2. Identify the enforcement procedure for safety violations and the individual(s) responsible for the enforcement of them. In addition, explain how violations are subject to discipline and the level of action that will be taken (examples: verbal warning, written warning, job counseling, suspension, or termination).
3. Identify how safety rules are established and enforced for contractors working in state facilities referencing applicable federal, state, and local standards.

Training and Communications:

1. Inform new employees of safety rules and enforcement procedures during new employee orientation.
2. Notify all employees of safety rules and enforcement procedures annually.

Program Review:

1. Review the rules in place and enforcement procedures/actions on an annual basis for adequacy and effectiveness.

Recordkeeping:

1. Maintain documentation that the safety rules and enforcement procedures were provided during new employee orientation and annually communicated to all employees.

**M. Methods for Accident Investigation, Reporting, and Recordkeeping**

Definition: A written procedure explaining and providing for the timely investigation of accidents, completion of required reporting and recording, and recordkeeping. Information resulting from accident investigation, reporting, and records may be used to prevent future employee risk, exposure, and accidents.

Written Policy/Procedure:

1. Develop procedures for the reporting, investigating, and recording workplace accidents. Ensure that the following types of accidents are investigated: injuries, illnesses, property damage, vehicle accidents, and near misses.
2. Identify the individual(s) who conduct initial investigations, follow-up investigations, and review completed accident investigation forms on a central, regional, or worksite level (examples: supervisors, safety coordinator, and/or safety committee members). Initial investigations must be completed within 24-48 hours of the reported accident.
3. Identify the accident investigation and witness statement forms used to document the details of accident including the factors that contributed to the accident and recommendations to prevent recurrences.
4. Identify the procedures to ensure investigation recommendations and corrective actions are implemented / completed.

Training and Communications:

1. Provide accident investigation training / instruction to those responsible for conducting and reviewing investigations.
2. Provide the accident investigation and witness statement report forms to those responsible for conducting initial or follow-up investigations.
3. Communicate accident investigation findings and recommendations with management, supervisors, and employees as appropriate for the awareness of hazards or changes in processes / procedures.

Program Review:

1. Review and analyze the completed incident investigation forms at least annually to determine the following:
2. Identify potential injury trends.
3. Develop recommendations, corrective actions, or goals and objectives.
4. Determine program compliance and effectiveness.

Recordkeeping:

1. Maintain completed incident investigation and witness statement forms.
2. Maintain training records of those responsible for conducting and reviewing investigations.
3. Maintain copies of communications related to incident investigations findings, recommendations, or corrective actions.

4. Maintain evaluations or incident analysis reports.

**N. Availability of First Aid, CPR, and Other Emergency Treatments**

Definition: Documentation explaining how prompt availability of first aid and CPR and other emergency treatments are provided for injured or suddenly ill employees. These treatments include on-site services, as well as those provided by the medical community.

Written Policy/Procedure:

1. Develop the agency’s approach for obtaining prompt emergency medical treatment. In addition to outside medical assistance, assess and determine the need for on-site services to adequately address all worksite locations.
2. The determination to train staff in first aid and CPR should be based on the following factors: agency / field site location(s), type of work performed, hazard exposures, type of on-site occupations/resources, and reasonable proximity to and/ or response time of outside emergency services.
3. In the absence of an infirmary, clinic, hospital, or outside emergency service providers in near proximity to the workplace, a person or persons shall be trained to render first aid and CPR. The following guidance is used to assist in determining the availability of outside emergency medical assistance and the need to provide on-site services.
4. Near proximity means that emergency care must be available within 3 to 4 minutes from the workplace if on-site services are not available to render first aid. This definition of near proximity applies to workplaces with the potential for serious injuries such as those involving stopped breathing, cardiac arrest, or uncontrolled bleeding resulting from hazards or serious accidents involving falls, suffocation, electrocution, or amputation.
5. A response time of up to 15 minutes is generally considered reasonable in workplaces, such as offices, where the possibility of such serious work-related injuries is more remote.
6. When on-site services are not available to render first aid, ensure outside emergency medical assistance will be available within the appropriate timeframe when an injury occurs.
7. If on-site services are needed, ensure adequate plans or procedures are developed to train staff and initiate a response.
8. Ensure adequate first aid supplies, personal protective equipment, and other emergency equipment are readily available and maintained for trained and designated on-site staff (examples: first aid kits, AED, gloves, eye / face shields, CPR masks, eye wash stations, and body fluid clean-up kits, etc.).
9. If AED’s are purchased and utilized, develop appropriate written procedures regarding their use and maintenance.

Training and Communications:

1. Provide education on the agency’s or appropriate site specific procedures during new employee orientation.
2. Annually communicate the agency’s policy and/or site specific procedures for obtaining emergency care to all employees.
3. Post or make available the emergency response procedures and contact information of trained and designated staff when providing on-site services.
4. Provide CPR, First Aid, and AED training and recertification, as applicable, through an accredited program such as the American Heart Association or Red Cross.
5. If AEDs are purchased, ensure that designated or expected users are trained and certified in First Aid, CPR, and AED usage.
6. Provide bloodborne pathogen training to all staff trained in First Aid, CPR, and AED usage (examples: reporting of exposures, universal precautions, body fluid clean-up/disposal, and post exposure care/treatment, etc.).

Program Review:

1. On an annual basis review the following to determine the adequacy and effectiveness of the program: work location procedures developed and adequate, training provided and current certifications maintained, contact information and communications provided, and appropriate PPE / emergency equipment available and maintained.

Recordkeeping:

1. Maintain documentation of new employee orientation training and annual communications to all employees.
2. Maintain documentation of bloodborne pathogens training for staff certified in First Aid, CPR, and AED usage.
3. Maintain current CPR, First Aid, and AED certifications.

**O. Method(s) for Determining and Evaluating A&IP Program Effectiveness**

Definition (as determined by the Office of Administration):The methods used to evaluate the effectiveness of the A&IP Program including a statistical analysis of losses incurred during the current and two previous complete fiscal years. The analysis of the statistical data must gauge overall performance, identify the type of injuries, where the injuries are occurring, and any other identifiable trends. In addition to statistical analysis, a review of all the safety program elements must be performed at least annually in order to evaluate compliance and effectiveness.

Written Policy/Procedure:

1. Develop the methods or procedures used to determine and evaluate program effectiveness.
2. Identify responsibilities for determining program effectiveness, including preparing statistical reports, conducting loss analyses, performing program evaluations, and communicating information (examples: safety coordinator, safety support staff, safety committee members, etc.).
3. Identify the program information, data (leading & trailing indicators), and frequency used to determine effectiveness.
4. Conduct a data analysis at least annually to measure performance. Include data for at least the current and previous two complete fiscal years.
5. Conduct an injury analysis at least annually to identify the type of injuries, where the injuries are occurring, and any other identifiable injury trends.
6. In addition to workers’ compensation claims data, the following examples of leading indicators should be considered when evaluating program effectiveness:
* program goals and objectives set / completed, tracking / analysis of incident only claims data, tracking / investigation of near miss incidents, number of hazards identified / corrected, inspections scheduled / conducted, , training sessions scheduled / conducted, safety suggestions received / reviewed, accidents reported / investigations conducted, tracking of employee safety survey responses over time, and percentage of program requirements met over time.
1. Review and evaluate all of the required and applicable program elements on an annual basis to ensure compliance and identify opportunities for improvement (examples: program reviews, gap analysis or self-audits).

Training and Communications:

1. Identify how statistical information, analysis reports, and program evaluation results are communicated throughout the agency (examples: management, supervisors, safety committee members, unions, employees).
* At minimum, program effectiveness and evaluation information must be provided to upper management (agency head, deputy secretaries, and bureau directors).

Program Review:

1. Annually review the methods, procedures, and information used for determining and evaluating program effectiveness. Utilize the information to assist in developing loss reduction strategies and establishing goals and objectives.

Recordkeeping:

1. Maintain statistical reports, loss analyses, and program reviews / evaluations for at least the current and previous two complete fiscal years.
2. Maintain documentation of agency communications.